

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ETHLOKIA PLUMBER, ex rel., K.W.

Plaintiffs,

v.

HARRIS COUNTY DEPARTMENT
OF EDUCATION,

Defendant.

§
§
§
§
§
§
§
§

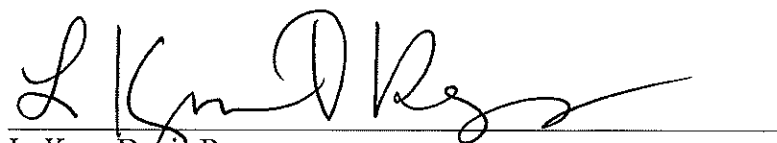
CIVIL ACTION NO. 4:20-CV-00672

Declaration of L. Kym Davis Rogers

1. I am an attorney with Disability Rights Texas, the Protection and Advocacy Agency for the State of Texas. My office is located at 1420 W. Mockingbird Lane, Dallas, Texas.
2. Disability Rights Texas, together with attorneys from Winston & Strawn LLP, have agreed to represent, pro bono, the plaintiffs in this matter if a new scheduling order is entered.
3. Counsel from Winston & Strawn and Disability Rights Texas require additional time to conduct discovery and prepare for trial in order to represent the plaintiffs.
4. If a new Scheduling Order is entered, new counsel will rely upon the discovery done to date to prevent any duplication and to focus the additional discovery. New counsel propose to take five depositions, and are willing to take these depositions virtually to lessen the burden on the parties and witnesses.
5. Brandon Duke and Rachael Thompson, Winston & Strawn, are admitted to practice in the Southern District of Texas. My application for admission is pending and an application for Kathryn Hogan, Disability Rights Texas, will be filed promptly.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas, Texas, on February 22, 2021.


L. Kym Davis Rogers